

SIDLEY AUSTIN LLP 1000 LOUISIANA STREET SUITE 6000 HOUSTON, TX 77002 (713) 495 4500 (713) 495 7799 FAX

cbell@sidley.com (713) 495 4508 BEIJING BOSTON BRUSSELS CHICAGO DALLAS FRANKFURT

GENEVA

HONG KONG
HOUSTON
LONDON
LOS ANGELES
NEW YORK
PALO ALTO
SAN FRANCISCO

SHANGHAI SINGAPORE SYDNEY TOKYO WASHINGTON, D.C.

FOUNDED 1866



August 23, 2013

National Freedom of Information Officer U.S. Environmental Protection Agency 1200 Pennsylvania Avenue, NW (2822T) Washington, DC 20460

Dear Sir or Madam:

This is a request made pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 522 and the implementing regulations of the Environmental Protection Agency ("EPA"), for copies of the following records:

- 1) All records discussing, describing, referring to or interpreting the Technical Support Document: -- Social Cost of Carbon for Regulatory Impact Analysis -- Under Executive Order 12866 (February 2010) ("2010 TSD on SCC") or the Technical Support Document: -- Technical Update to the Social Cost of Carbon for Regulatory Impact Analysis Under Executive Order 12866 (May 2013) ("2013 TSD on SCC").
- 2) To the extent not provided in response to request #1, all records of information relied upon by the Interagency Working Group on Social Cost of Carbon, United States Government ("IWG on SCC") in the development of the 2010 TSD on SCC and the 2013 TSD on SCC, including but not limited to:
 - a) Any presentations, reports, studies, computer or other analytical models, and data (including modeling data) created by or on behalf of the *IWG on SCC*, or provided to or obtained by the *IWG on SCC*.
 - b) Any records that discuss, describe, interpret or otherwise relate to the Integrated Assessment Models ("IAMs") referenced in the 2010 TSD on SCC or the 2013 TSD on SCC, including but not limited to:
 - any inputs and assumptions (including but not limited to assumptions on discounting, equilibrium climate sensitivity, and socioeconomic variables);
 - ii) the results of any modeling runs or scenarios generated by the IAMs (in both paper copies and in original electronic form); and
 - iii) the source codes for the DICE, PAGE and FUND models referred to in the 2010 TSD on SCC or 2013 TSD on SCC (in the original electronic form, such as native modeling formats).



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- c) Any records that identify, discuss, interpret or relate to any uncertainties or error rates of the 2010 TSD on SCC or the 2013 TSD on SCC or any of the IAMs referenced in or relied upon by the 2010 TSD on SCC or the 2013 TSD on SCC, including but not limited to any limitations in using the DICE, PAGE or FUND models to make predictions beyond the year 2100.
- d) Any records that discuss, interpret or explain why the social cost of carbon estimated by the 2013 TSD on SCC is approximately 60% higher than that estimated by the 2010 TSD on SCC.
- e) Any records that discuss, interpret, relate to, explain or make recommendations or decisions regarding global versus domestic measures of the social cost of carbon with respect to the work of the IWG on SCC and the 2010 TSD on SCC or 2013 TSD on SCC, including but not limited to the calculation or use of a domestic SCC for the United States.
- 3) Any records discussing, interpreting, transmitting or relating to any critiques, analyses or studies of the 2010 TSD on SCC or 2013 TSD on SCC, or any data, information or models relied on or referred to in the 2010 TSD on SCC or 2013 TSD on SCC, including but not limited to the work or statements of Robert Pindyck.

For purposes of this request, "records" mean documents, information, memoranda, letters, reports, drafts, communications, records of communications, telephone message records, calendars, agendas, meeting sign-in sheets, presentations, handwritten or typed notes, facsimile transmissions, electronic mail, transcripts or recordings (audio or visual) of meetings, tapes and all other types of records in the possession, control or custody of EPA or contractors working for EPA.

For all records responsive to these requests that are not produced based on an asserted exemption from disclosure, please prepare a privilege and/or exemption log describing, at a minimum: (i) the type of record withheld; (ii) the date(s) of the creation of the record; (iii) the subject of the record; (iv) the identity of the author and all recipients of the records; and (v) a detailed description of the basis upon which EPA is withholding the record (e.g., the claim of privilege, FOIA exemption, etc.). To the extent any responsive documents are withheld based upon a claim of privilege or other exemption from disclosure, please produce redacted copies of all non-privileged or non-exempt factual material contained within such documents.

As required by law, please provide the above records within twenty (20) business days of receipt of this FOIA Request. 5 U.S.C. § 552(a)(6)(A)(i). If it appears that it may not be possible to provide all of the records by the statutorily-mandated deadline, please provide the responsive records that are available as of the deadline (i.e., do not withhold responsive records past the



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deadline while searching for additional records), and please contact me promptly regarding any scheduling issues.

I confirm in advance my willingness to pay for all reasonable costs associated with searching for and copying these records. However, should these costs exceed \$500, I ask that you contact me prior to proceeding.

Thank you for your prompt attention to this request. Please direct any inquiries, notices, or determinations to me at (713) 495-4508 or cbell@sidley.com.

Sincerely,

/s/ Christopher L. Bell

Christopher L. Bell